

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA**

IN RE:

Kara Ann Bradley,

Debtor.

Case # 22-03051-eg

Chapter 13

LIMITED OBJECTION TO CONFIRMATION OF PLAN

Creditor Barton Brimm, PA (“Creditor”) hereby objects to confirmation of the Debtor’s Chapter 13 plan on the following limited grounds:

1. Creditor is the holder of a post-petition priority claim pursuant to 11 U.S.C. § 503(b)(2) and § 507(a)(2).¹
2. Section 4.1 of the Debtor’s plan provides that post-petition priority obligations are to be paid by the Debtor directly to the holder of the claim, “unless otherwise ordered by the Court.”
3. Because Creditor’s claim is a lump-sum priority obligation, rather than an ongoing monthly or yearly priority obligation, Creditor requests that payments on its claim be made by the Chapter 13 Trustee. Therefore, Creditor objects to the extent that the plan provides that the Debtor will make payments to Creditor directly. 11 U.S.C. § 1326(b)(1).
4. Further, pursuant to 11 U.S.C. § 1325(a)(4), Creditor objects to the plan to the extent that Creditor’s claim is not paid 100%, given the excess non-exempt equity in the Debtor’s residence as well as other non-exempt assets.

¹ See POC #6.

WHEREFORE, Creditor requests that confirmation of the Debtor's plan filed on March 12, 2023 be denied unless amended to provide that Creditor's claim will be paid 100% and that Creditor's claim shall be paid by the Chapter 13 Trustee.

RESPECTFULLY SUBMITTED on this the 5th day of April, 2023.

BARTON BRIMM, PA

BY: /s/ Christine E. Brimm

Christine E. Brimm, #6313

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Chapter 7

CERTIFICATE OF SERVICE

I, Connie Fraser, hereby certify that on behalf of the Chapter 7 Trustee, I served a copy of the **LIMITED OBJECTION TO CONFIRMATION OF PLAN** filed **March 12, 2023** on the parties shown below, via CM/ECF and/or First Class Mail, as indicated, on April 5, 2023.

Kara Ann Bradley
2940 Gantt Drive
Johns Island, SC 29455
Via First Class Mail

William Joseph Virgil Barr, Esq.
Recovery Law Group
20 Dimery Street
Kingstree, SC 29556
Via CM/ECF

BARTON BRIMM, PA

BY: /s/ Connie Fraser
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